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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND CALIFORNIA STATE LANDS  
COMMISSION EXTENDING TIME TO  
RESPOND TO LEASE ASSUMPTION  
MOTION**

Re: Dkt. No. 3726

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the California State  
4 Lands Commission (the “**Commission**”), on the other hand. The Debtors and the Commission  
5 are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and  
6 each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On August 27, 2019, the Debtors filed the *Fifth Omnibus Motion of the Debtors*  
9 *Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order*  
10 *Approving Assumption of Certain Real Property Leases* [Dkt. No. 3726] (the “**Lease**  
11 **Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on September 24,  
12 2019. Any response or opposition to the Lease Assumption Motion is due by 4:00 p.m. (Pacific  
13 Time) on September 10, 2019.

14 B. Counsel for the Commission has requested, and counsel for the Debtors has  
15 agreed, that the time for the Commission to respond to the Lease Assumption Motion be  
16 extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
21 **THAT:**

22 1. The time for the Commission to file and serve any response or opposition to the  
23 Lease Assumption Motion is extended through 4:00 p.m. (Pacific Time) on September 13, 2019.

24 *[Signatures on next page]*  
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Dated: September 9, 2019  
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp  
Thomas B. Rupp  
  
*Attorneys for Debtors  
and Debtors in Possession*

Dated: September 9, 2019  
XAVIER BECERRA  
Attorney General of California  
MARGARITA PADILLA  
Supervising Deputy Attorney General

/s/ Paul J. Pascuzzi  
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LLP  
  
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Commission*